



The Commonwealth of Massachusetts
DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY

MILFORD WATER COMPANY

D.T.E. 05-61

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY TO
MILFORD WATER COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Milford Water Company ("Milford" or "Company") the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning

documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve copies of the responses as follows: (a) an original and four (4) copies to Mary L. Cottrell, Secretary of the Department; and (b) one (1) copy to all parties. All written documents (except those for which confidential treatment is sought) should also be submitted to the Department in electronic format using one of the following methods: (1) by e-mail attachment to dte.efiling@state.ma.us and to John.Geary@state.ma.us; or (2) on a 3.5" disk, IBM-compatible format. The text of the e-mail or the disk label must specify: (1) the docket number of the proceeding (D.T.E. 05-61), (2) name of the person or company submitting the filing, and (3) a brief descriptive title of the document (e.g., Response to Information Requests). The electronic filing should also include the name, title and phone number of a person to contact in the event of questions about the filing. Text responses should be created in either Corel WordPerfect, Microsoft Word, or as an Adobe-compatible PDF file. Data or spreadsheet responses should be compatible with Microsoft Excel. Documents submitted in electronic format will be posted on the Department’s Website, <http://www.mass.gov/dte>.

For Bulk Responses, one (1) copy should be submitted directly to John Geary and one (1) copy should be submitted directly to Sean Hanley.

8. All non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.
9. Responses are due by the close of business (5:00 p.m.) Friday, December 30, 2005.

INFORMATION REQUESTS

- DTE 1-1 Refer to Exh. SBA 1, Summary Tables 1 through 5. Please provide electronic copies in Microsoft Excel format of the underlying data.
- DTE 1-2 Refer to Exh. SBA 1, Proposed Rates, Schs. R-1 through R-9. Please provide electronic copies in Microsoft Excel format of the underlying data.
- DTE 1-3 Refer to Exh. SBA 1, at 2 of 67, Supporting Calculations - Cost of Service, Schs. R-1 through R-9. Please provide electronic copies in Microsoft Excel format of the underlying data.
- DTE 1-4 Refer to Exh. SBA 1, at 2 of 67, Supporting Calculations - Rate Design, WP-+Prv Fire Des through WP-BA-Prop-2. Please provide electronic copies in Microsoft Excel format of the underlying data.
- DTE 1-5 Refer to Exh. SBA 1, Miscellaneous Workpapers, WP-Payroll through WP-MISC REV. Please provide electronic copies in Microsoft Excel format of the underlying data.
- DTE 1-6 Refer to Exh. SBA 1, Comparative Financial Statements. Please provide electronic copies in Microsoft Excel format of the underlying data.
- DTE 1-7 Please refer to the pre-filed testimony of Mr. Alcott at 10, line 16, and Exh SBA-1, at 3 ("Sales for Resale"). Explain in detail why the Sale for Resale amount referenced Mr. Alcott testimony is different from the amount in Exh. SBA-1.
- DTE 1-8 Please refer to Exh. SBA-1, at 52 ("Miscellaneous Expense Calculations"). Explain in detail why the uncollectible amount reported for calendar year 2004 is higher than the uncollectible amount reported for 2002; and further explain why the 2004 uncollectible is higher by an even greater magnitude for 2003.
- DTE 1-9 Please refer to Exh SBA-1, at 52 ("Miscellaneous Expense Calculations"). Regarding the Employee Health Insurance account, explain in detail why there is a dollar amount difference in monthly premium payments among employees.